

AUG 18 2016

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION
AUGUST 2016 SESSION

JULIA C. DUDLEY, CLERK
BY: *[Signature]*
DEPUTY CLERK

UNITED STATES OF AMERICA

v

JEREMIAH TYMELL KING

Criminal No. 7:16-cr-45

INDICTMENT

In Violation of:

21 U.S.C., § 841(a)(1)

18 U.S.C., § 922(g)(1)

COUNT ONE

The Grand Jury charges:

1. That on or about March 9, 2016, in the Western Judicial District of Virginia, the defendant, JEREMIAH TYMELL KING, did knowingly and intentionally distribute a measurable quantity of a mixture and substance containing heroin, a Schedule I controlled substance.

2. In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT TWO

The Grand Jury further charges:

1. That on or about March 16, 2016, in the Western Judicial District of Virginia, the defendant, JEREMIAH TYMELL KING, did knowingly and intentionally distribute a measurable quantity of a mixture and substance containing heroin, a Schedule I controlled substance.

2. In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT THREE

The Grand Jury further charges:

1. That on or about May 5, 2016, in the Western Judicial District of Virginia, the defendant, JEREMIAH TYMELL KING, did knowingly and intentionally distribute a measurable quantity of a mixture and substance containing heroin, a Schedule I controlled substance.

2. In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT FOUR

The Grand Jury further charges:

1. That on or about July 12, 2016, in the Western Judicial District of Virginia, the defendant, JEREMIAH TYMELL KING, did knowingly and intentionally distribute a measurable quantity of a mixture and substance containing heroin, a Schedule I controlled substance.

2. In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT FIVE

The Grand Jury further charges:

1. That on or about July 13, 2016, in the Western Judicial District of Virginia, the defendant, JEREMIAH TYMELL KING, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit a

Glock, Model 19 pistol, which had previously been shipped or transported in interstate or foreign commerce.

2. In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

1. Upon conviction of the felony offenses alleged in this Indictment, defendant shall forfeit to the United States:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses, pursuant to 21 U.S.C. § 853(a)(1).
- b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said offenses, pursuant to 21 U.S.C. § 853(a)(2).
- c. any firearm used or intended to be used to facilitate the transportation, sale, receipt, possession, or concealment of controlled substances and/or raw materials, as described in 21 U.S.C. § 881(a)(1) and (2), and any proceeds traceable to such property, pursuant to 21 U.S.C. § 881(a)(11) and 28 U.S.C. § 2461(c).
- d. any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

2. The property to be forfeited to the United States includes but is not limited to the following:

- (a) **Firearm:**

One Glock model 19 9mm pistol, serial #BAVU815
All ammunition associated with this firearm

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

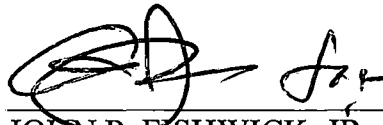
- (a) cannot be located upon the exercise of due diligence;

- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to Title 21 United States Code, Section 853(p), including but not limited to the property described in paragraph 2.

A TRUE BILL this 18th day of August, 2016.

s/Grand Jury Foreperson
FOREPERSON



JOHN P. FISHWICK, JR.
UNITED STATES ATTORNEY